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14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17
18 **IN RE GOOGLE PLAY STORE**
ANTITRUST LITIGATION

19 THIS DOCUMENT RELATES TO:

20 *In re Google Play Consumer Antitrust*
21 *Litigation*, Case No. 3:20-cv-05761-JD

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Case No. 3:21-md-02981-JD

**STIPULATION AND [PROPOSED]
ORDER RE: FILING AMENDED
ANSWER TO CONSUMER
PLAINTIFFS' SECOND AMENDED
COMPLAINT**

1 WHEREAS, Consumer Plaintiffs filed their Second Amended Complaint (“SAC”) (3:21-
2 md-02981-JD ECF No. 172; 3:20-cv-05761-JD ECF No. 241) on December 20, 2021;

3 WHEREAS, Defendants (“Google”) filed their Answer to Consumer Plaintiffs’ SAC
4 (3:21-md-02981-JD ECF No. 180; 3:20-cv-05761-JD ECF No. 247) on January 14, 2022;

5 WHEREAS, the Court entered the Scheduling Order on October 22, 2021 (3:21-md-
6 02981-JD ECF No. 122) which set a deadline for amending pleadings on December 3, 2021, and
7 an Amended Scheduling Order (3:21-md-02981-JD ECF No. 191) on February 2, 2022 stating that
8 the deadline to amend pleadings was “closed”;

9 WHEREAS, Google wishes to correct the numbering of the cross-references in certain
10 paragraphs;

11 WHEREAS, Google believes that there is good cause to amend its Answer;

12 WHEREAS, Google and Consumer Plaintiffs are not aware of any prejudice on any party
13 in the above-captioned actions that would result from permitting Google to amend its Answer;

14 WHEREAS, the Consumer Plaintiffs do not oppose this amendment;

15 WHEREAS, Google’s proposed corrections are reflected in the attached Exhibit 1, and can
16 be seen in paragraphs 31, 38, 47, 65, 188, 190, 211, 213, 214, 222, 232, 240, 270, 281, 288, 289,
17 303, 304, 312, 326, and 335.

18 NOW, THEREFORE, the Defendants and Consumer Plaintiffs hereby stipulate and agree,
19 subject to the Court’s approval, as follows:

- 20 1. There is good cause to permit Google to amend its Answer to Consumer Plaintiffs’
21 SAC, as reflected in Exhibit 1 attached hereto;
- 22 2. Google’s request to amend its Answer (3:21-md-02981-JD ECF No. 180; 3:20-cv-
23 05761-JD ECF No. 247) to Consumer Plaintiffs’ SAC (3:21-md-02981-JD ECF
24 No. 172; 3:20-cv-05761-JD ECF No. 241) in accordance with Exhibit 1 should be,
25 and upon the Court’s signature is hereby, granted;
- 26 3. Upon the Court’s signature, Google will file its amended answer, in accordance
27 with Exhibit 1, on the docket as a separate ECF entry.

28 IT IS SO STIPULATED.

1 DATED: March 22, 2022

MORGAN, LEWIS & BOCKIUS LLP

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Sujal J. Shah
Michelle Park Chiu
Minna L. Naranjo
Rishi P. Satia

5 Respectfully submitted,

7 By: /s/ Brian C. Rocca
Brian C. Rocca
8 *Counsel for Defendants Google LLC et al.*

9
10 DATED: March 22, 2022

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13 Respectfully submitted,

15 By: /s/ Daniel M. Petrocelli
Daniel M. Petrocelli
16 *Counsel for Defendants Google LLC et al.*

17
18 DATED: March 22, 2022

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22 Respectfully submitted,

24 By: /s/ Glenn D. Pomerantz
Glenn D. Pomerantz
25 *Counsel for Defendants Google LLC et al.*

1 Dated: March 22, 2022

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4 Respectfully submitted,

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7 *Co-Lead Counsel for the Proposed Class in*
8 *In re Google Play Consumer Antitrust*
9 *Litigation*

E-FILING ATTESTATION

I, Kuruvilla Olasa, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Kuruvilla Olasa

Kuruvilla Olasa

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2
3 DATED: _____

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5
6 HON. JAMES DONATO
U.S. District Judge